



MCI Telecommunications  
Corporation  
1801 Pennsylvania Avenue, NW  
Washington, DC 20006

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Federal Communications Commission  
Office of the Secretary

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December 4, 1992

Ms. Donna Searcy  
Secretary  
Federal Communication Commission  
Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: In the Matter of: Admendment of Part 69 Allocation of General Support  
Facility Costs, CC Docket 92-222.

Dear Ms. Searcy,

Enclosed herewith for filing are the original and nine (9) copies of MCI Telecommunications Corporation's Comments in the above reference matter.

Please acknowledge receipt by affixing an appropriate notation on the copy of MCI's Petition, furnished for such purpose and remit same to the bearer.

Yours truly,

Gregory J. Darnell  
Manager, Regulatory Analysis

No. of Copies rec'd 0+6  
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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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DEC - 4 1992

Federal Communications Commission  
Office of the Secretary

In the Matter of:

Amendment of Part 69 Allocation  
of General Support Facility Costs

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CC Docket No. 92-222

**COMMENTS OF MCI TELECOMMUNICATIONS CORPORATION**

Pursuant to the Notice of Proposed Rulemaking (NPRM), released October 19, 1992 in the above referenced matter, MCI Telecommunications Corporation (MCI) hereby submits comments on the proposed revision to the Part 69 rules used to allocate General Support Facilities (GSF) between the access elements.

In the wake of the Commission's Report and Order adopting Special Access Collocation,<sup>1</sup> the issue of whether or not a contribution charge is necessary to alleviate any perceived LEC hardship which may result from special access collocation was discussed. The Commission found that provided "that support flows imposed by regulation can be demonstrated to affect the rates of LEC services subject to competition, similar support burdens should be imposed on interconnecting competitors."<sup>2</sup> The Commission, however, found that the only significant support flow affecting the special

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<sup>1</sup> In the Matter of Expanded Interconnection with Local Telephone Company Facilities, Report and Order, CC Docket No. 91-141, released October 19, 1992.

<sup>2</sup> Ibid., ¶ 149.

access rates subject to competition is caused by the current non-cost-based allocation of GSF.<sup>3</sup>

As identified in the Commission's NPRM, the requirements of the current Part 69 rules causes "substantial under-allocations of costs to the common line category and over-allocations to other categories, including both special access and switched transport."<sup>4</sup> This occurs because of the Part 69 requirement that the LECs exclude subscriber loop investment when allocated GSF overhead costs among access categories.<sup>5</sup>

The solution seems obvious, if the non-cost-based GSF allocation is eliminated, the need for a contribution element is also eliminated. MCI agrees with this conclusion and supports the proposed Part 69.307 revision to eliminate the words "excluding Category 1.3", as a short term settlement for a complicated issue.<sup>6</sup> This revision would apportion GSF revenue requirement in a more cost based fashion between the Base Factor Portion, Switching, Transport, Information, Special Access and Interexchange access elements.

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<sup>3</sup> Ibid., ¶ 147.

<sup>4</sup> Ibid.

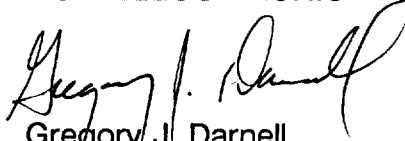
<sup>5</sup> 47 C.F.R. § 69.307 (excluding Category 1.3 Cable and Wire Facilities from apportionment of GSF investments). See also 47 C.F.R. § 36.154(a) (defining Category 1.3).

<sup>6</sup> Ibid., ¶ 269.

MCI, however, contends that this is cannot be considered a long term solution for the problem of determining the appropriate distribution of economic and uneconomic costs between access elements.

Respectfully Submitted,

MCI TELECOMMUNICATIONS CORPORATION

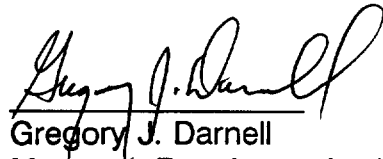
A handwritten signature in black ink, appearing to read "Gregory J. Darnell", written in a cursive style.

Gregory J. Darnell  
Manager, Regulatory Analysis  
1801 Pennsylvania Avenue, NW  
Washington, DC 20006  
(202) 887-3290

December 4, 1992

### STATEMENT OF VERIFICATION

I have read the foregoing, and to the best of my knowledge, information, and belief there is good ground to support it, and that it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct. Executed on December 4, 1992.

A handwritten signature in black ink, appearing to read "Gregory J. Darnell", written over a horizontal line.

Gregory J. Darnell  
Manager, Regulatory Analysis  
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## CERTIFICATE OF SERVICE

I, Carolyn McTaw, do hereby certify that copies of the foregoing MCI Petition were sent via first class mail, postage paid, to the following on this 4th day of December, 1992:

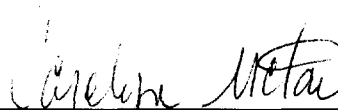
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